

Monte J. White and Associates
Monte J. White
1106 Brook Ave, Hamilton Place
Wichita Falls, TX 76301
(940)723-0099
(940)723-0096 Fax

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§
John T Thomas	§ Case No. 13-70182HdH-13
and	§
Rhonda Gayle Thomas	§
DEBTORS	§

DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM
AUTOMATIC STAY OF Brownings Reliable Cars & Trucks

TO THE HONORABLE JUDGE OF SAID COURT:

Come now Debtors in the above-titled cause and file this Response to Motion for Relief from Automatic Stay.

On September 3, 2013, Attorney for Brownings Reliable Cars & Trucks, Gail E. Stock, filed a Motion for Relief from Automatic Stay, in response thereto, Debtors would show the following:

1. ADMIT
2. ADMIT
3. DENY
4. DENY
5. DENY
6. DENY
7. DENY

WHEREFORE, PREMISES CONSIDERED, Debtors pray that motion be denied in all respects, that the Court award reasonable and necessary attorney fees for the defense of this Motion and for such other and further relief to which they may be entitled.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Motions for Relief from Stay was served by ECF and/or mailed on September 5, 2013, to the following as indicated:

/s/Monte J. White
Attorney for Debtors

Movant: Brownings Reliable Cars & Trucks
4570 Seymour Highway
Wichita Falls, TX 76308

Attorney for Movant: Gail E. Stock
Jameson & Dunagan, PC
3890 W. Northwest Hwy, Suite 600
Dallas, TX 75220

Trustee: Chapter 13 Trustee
Walter O'Cheskey
6308 Iola Ave.
Lubbock, TX 79424

U.S. Trustee
William T. Neary
1100 Commerce Street, Room 9-C-60
Dallas, TX 75242

Debtor: John T. Thomas
Rhonda Gayle Thomas
3033 Moffett
Wichita Falls, TX 76308